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April 11, 2003

The Honorable Jeffrey W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, DC 20590

Dear Dr. Runge:

**Re.: Federal Motor Vehicle Theft Prevention Standard; Notice of Proposed Rulemaking
(67 Fed. Reg. 43075; Docket No. NHTSA-2002-12231)-32**

The Alliance of Automobile Manufacturers (Alliance), whose members are BMW Group, DaimlerChrysler, Ford Motor Company, General Motors, Mazda, Mitsubishi Motors, Nissan, Porsche, Toyota, and Volkswagen, is aware that DaimlerChrysler has recently written to you, asking that your agency refrain from issuing a final rule extending parts marking requirements to all vehicle lines until the agency receives from the Department of Justice, the complete record supporting the Attorney General's Initial Report on parts marking effectiveness.

The Alliance endorses this request. The Anti-Car Theft Act requires the Attorney General to provide you with this decision support record, and we know of no reason why that record should not be available for public scrutiny and review before a final rule is issued.

It is a cardinal principle of federal rulemaking process that information supporting federal regulatory decisions should be publicly available. Despite the somewhat unusual nature of this particular rulemaking proceeding, in that it involves two separate agencies of government, there is no exception in the Anti-Car Theft Act from the public participation provisions of the Administrative Procedures Act.

The Alliance urges you to defer a final rule in this proceeding until the Department of Justice provides your agency with the complete record supporting the Attorney General's decision.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Strassburger". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert Strassburger
Vice President
Vehicle Safety and Harmonization
Alliance of Automobile Manufacturers

**BMW Group • Daimler Chrysler • Ford Motor Company • General Motors
Mazda • Mitsubishi Motors • Nissan • Porsche • Toyota • Volkswagen**